

Human Capital & Culture

# ESG Integration & Reporting Policy

## Purpose

The purpose of this policy is to establish a structured, organization-wide approach for embedding ESG (Environmental, Social, and Governance) principles into the decision-making, operational practices, and performance reporting of B&S Investments. As a Saudi-rooted investment group operating globally across diverse sectors—including exhibitions, manufacturing, tourism, hospitality, creative content, and digital ventures—B&S Investments acknowledges the growing importance of ESG factors in creating long-term stakeholder value and mitigating non-financial risks.

This policy ensures that ESG performance is not treated as a compliance obligation alone, but as a strategic enabler that enhances competitiveness, brand reputation, and access to global investment partnerships.

## Scope

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This policy applies to all business units, subsidiaries, joint ventures, and corporate departments within B&S Investments. It is relevant to all executives, managers, and employees whose decisions or operations may affect or be affected by ESG risks, opportunities, and reporting obligations. It also guides the Group's interaction with investors, regulatory bodies, rating agencies, suppliers, and ESG assurance providers.

Covered domains include:

- **Environmental:** climate impact, energy efficiency, water use, waste management, biodiversity
- **Social:** community development, diversity and inclusion, employee welfare, labor practices, safety
- **Governance:** board structure, ethics, risk oversight, compliance, transparency.

## Policy Statement

B&S Investments is committed to the full integration of ESG factors into its corporate strategy, operational processes, and investment decisions. The Group will:

- Align with leading ESG reporting frameworks (e.g., GRI, SASB, ISSB, and the UN Sustainable Development Goals)
- Incorporate ESG risk assessments into enterprise-wide risk management and investment planning
- Set measurable ESG objectives and regularly review progress at board and executive levels
- Promote transparency through public ESG disclosures and stakeholder engagement
- Drive continuous improvement through benchmarking, innovation, and employee participation
- Ensure ESG data is accurate, auditable, and timely for both internal and external reporting

ESG is not a siloed responsibility; it is embedded in the culture and accountability structures of the Group..

## Roles & Responsibilities

Role	Responsibility
<b>Board of Directors &amp; ESG Committee</b>	Provide oversight of ESG strategy, approve ESG disclosures, and review risk alignment
<b>Chief Executive Officer (CEO)</b>	Lead ESG integration across the Group and champion accountability at the leadership level
<b>Chief Sustainability Officer / ESG Lead</b>	Design and execute ESG programs, coordinate reporting, and align with frameworks
<b>Sector Executives &amp; Department Heads</b>	Embed ESG considerations into planning, budgeting, procurement, and operations
<b>Finance Department</b>	Ensure ESG data is aligned with financial disclosures and audit standards
<b>Compliance &amp; Risk Teams</b>	Map ESG risks to enterprise risk register and maintain regulatory compliance

Role	Responsibility
<b>Communications &amp; Investor Relations</b>	Manage ESG reporting distribution and stakeholder communications
<b>All Employees</b>	Understand their role in achieving ESG goals and participate in relevant initiatives

## Procedures & Implementation

### 1. ESG Strategy Integration

- ESG objectives are defined in line with the Group's business strategy, sector goals, and regulatory commitments
- Each business unit is required to incorporate ESG impact assessments and improvement plans in its annual operating plan
- Strategic initiatives (e.g., new investments, site expansion, major partnerships) must include ESG due diligence

### 2. ESG Data Management

- Key ESG performance indicators are tracked centrally in the ESG Reporting Dashboard
- Data is collected quarterly through automated systems and validated by sector leads
- Material topics are defined through a double materiality assessment (impact on and from the business)
- ESG data is aligned with frameworks such as:
- GRI (Global Reporting Initiative)
- SASB (Sustainability Accounting Standards Board)
- ISSB (International Sustainability Standards Board)
- CDP, TCFD, and UN SDGs where applicable

### 3. Internal Reporting & Review

- ESG performance is presented quarterly to the ESG Committee and annually to the Board
- A gap analysis is conducted every 12 months to identify improvement areas across E, S, and G pillars

- Sector executives are responsible for corrective actions when ESG targets are not met

#### 4. External ESG Disclosure

- An Annual ESG Report is published, covering strategy, performance, materiality, and future commitments
- Key disclosures may include:
  - Energy consumption and carbon footprint
  - Workforce diversity and inclusion metrics
  - Community engagement highlights
  - Governance practices, board independence, and ethical compliance
- The report is made available to investors, regulators, clients, and the public via the company website

#### 5. Benchmarking & Ratings Engagement

- The ESG Lead monitors the company's standing in global ESG indices (e.g., MSCI ESG, Sustainalytics, FTSE4Good)
- Relevant surveys and questionnaires from rating agencies are completed with cross-functional input
- Action plans are developed to improve scores and align with investor expectations

#### 6. Training & Culture Building

- ESG awareness modules are included in new employee onboarding
- Annual training sessions are held for leaders and staff on emerging ESG risks and best practices
- An internal ESG Recognition Program rewards departments with exemplary ESG contributions

### Monitoring & Review

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The ESG Integration & Reporting Policy is reviewed annually by the ESG Committee. Revisions may be triggered by:

- Regulatory changes (e.g., Saudi Green Initiative, EU CSRD)
- Shifts in stakeholder or investor expectations
- Entry into new markets or industries

- Audit or rating agency findings

Metrics used to monitor policy effectiveness include:

- % of ESG targets achieved across departments
- ESG disclosure compliance with target frameworks
- ESG audit outcomes and data accuracy ratings
- Investor feedback or ESG rating improvements
- Employee ESG engagement rates.

## Associated Documents

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- B&S ESG Strategy & Roadmap
- ESG Risk Register
- ESG Materiality Assessment Template
- ESG Reporting Dashboard & Data Dictionary
- ESG Report Template (GRI-aligned)
- ESG Audit Procedure Manual
- Stakeholder Engagement Plan
- Employee ESG Onboarding Materials
- Supplier ESG Code of Conduct
- Sustainability & Environmental Policies
- CSR & Community Impact Policy
- Governance Risk & Compliance Framework